

LAW OFFICES OF
WONG, WONG & ASSOCIATES, P.C.

RAYMOND H. WONG *
VALERIE Y. C. WONG *

150 BROADWAY, SUITE 1588
NEW YORK, NY 10038
PHONE: (212) 566-8080
FACSIMILE: (212) 566-8960

NEW JERSEY OFFICE
12 ROSZEL RD, STE A102
PRINCETON, NJ 08540
PHONE: (609) 520-1668
FACSIMILE: (609) 520-1168

ROBERT JUN ‡
NATALYA RUTCHYK *
EFRAIM S. LIPSCHUTZ ‡
DOUGLAS DOOLING, JR. ◇
ARDINEZ DOMGJONI *

* MEMBER NY & NJ BARS
‡ MEMBER NY BAR
◇ MEMBER NJ BAR

September 4, 2019

Magistrate Judge Steven C. Mannion
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Kenneth Chang a/k/a Kan Zhang v. The Bank of New York Mellon Corp
Civ. Action No.: 2:17-cv-11061
June 25, 2019 Scheduling Order

* Ms. Wang has never appeared for any conference in this case. She needs to make this case a priority on to find other available counsel.
The sett. conf is adjourned to 11/13/19 at 2PM.

* Fact deposition discovery extended to 10/31/19.

SO ORDERED

s/Steven C. Mannion

Steven C. Mannion, U.S.M.J.

Date: 9/9/19

Dear Judge Mannion:

This Firm represents Kenneth Chang a/k/a Kan Zhang ("Plaintiff") in the above entitled action. The parties met with Your Honor on August 6, 2019 regarding discovery matters. Subsequently, Your Honor signed a Supplemental Scheduling Order setting deadlines for discovery. These included deadlines for when the depositions are to be completed. Our firm conferred with opposing counsel regarding dates to take Defendants' depositions. We provided dates on which our lead counsel, Valerie Wong, is available to take the depositions. Defendants responded that they are unavailable on any of the dates provided by our firm. We are therefore forced to request from the judge an extension for conducting depositions.

Additionally, in the Supplemental Scheduling Order, Your Honor ordered that at the next settlement conference, scheduled for October 30, 2019, lead trial counsels must appear at the conference. Plaintiff's lead trial counsel will not be able to appear because she will be in Philadelphia for a trial in federal court. If the Court wishes to set up another telephone conference, please let this Firm know.

Thank you for your attention to this matter.

For Plaintiff:

/s/ Raymond H. Wong

Raymond H. Wong